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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

JINJU ZHANG, an individual,  
  
Plaintiff,  
  
v.  
  
BENLIN YUAN, an individual; HONG  
LIN, an individual; CAMIWELL, INC., a  
California corporation; CAMIWELL,  
INC. (CANADA), a Canadian  
corporation; BEIJING ASIACOM  
INFORMATION TECHNOLOGY CO.,  
LTD., a Chinese corporation; ASIACOM  
AMERICAS, INC., a Virginia  
corporation; BANK OF AMERICA  
CORPORATION, a National Association;  
and DOES 1-20, inclusive  
  
Defendants.

Case No.: 3:23-cv-05818-VC

**PLAINTIFF JINJU ZHANG’S  
REQUEST FOR JUDICIAL NOTICE IN  
SUPPORT OF PLAINTIFF’S  
OPPOSITION TO MOTION FOR  
SUMMARY JUDGMENT**

Date: August 15, 2024  
Time: 10 am  
Judge: Hon. Vince Chhabria  
Courtroom: 4 – 17<sup>th</sup> Floor

Plaintiff, JINJU ZHANG (“Plaintiff”) submits the following Request for Judicial Notice in support Plaintiff’s opposition to the Motion for Summary Judgment filed by Defendants Benlin Yuan (“Yuan”) and Hong Lin (“Lin”) (collectively “Defendants”).

Plaintiffs request that the court take judicial notice of the following documents pursuant to the Federal Rules of Evidence 201.

PLAINTIFF’S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PLAINTIFF’S OPPOSITON TO  
MOTION FOR SUMMARY JUDGMENT

**Request for Judicial Notice No. 1**

Exhibit 1 Documents pertaining to Camiwell U.S. on file with the California Secretary of State including but not limited to the Election to Terminate dated September 28, 2023, submitted herewith as **Exhibit 1**.

The Election to Terminate on file with the California Secretary of State can be readily obtained from the California Secretary of State website at <https://businesssearch.sos.ca.gov/> including but not limited to the following information obtained on July 26, 2024.

Judicial notice of this information is proper pursuant to Federal Rules of Evidence 201 because it is a record on file with the California Secretary of State and is capable of “immediate and accurate determination by resort to sources of reasonably indisputable accuracy.” See <https://businesssearch.sos.ca.gov/>

Dated: July 29, 2024

SAC Attorneys LLP

By: /Brian Barnhorst  
James Cai, Esq.  
Brian A. Barnhorst, Esq.  
Julie Bonnel-Rogers, Esq.  
Dennis Chin, Esq.  
Attorneys for Plaintiff, JINJU ZHANG

**Exhibit 1**

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PLAINTIFF’S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF PLAINTIFF’S OPPOSITON TO  
MOTION FOR SUMMARY JUDGMENT